

the casino application. Moreover, Sibbison's draft noted that Ickes (or his office) understood that the Congressmen had expressed similar concerns at a prior meeting.³³²

Ultimately, the response to the June 12 letter from the Minnesota delegation opposing the casino proposal was sent over Secretary Babbitt's signature on Sept. 14, 1995, two months after DOI announced the decision to deny the Hudson application. Ickes expressed surprise that his office did not directly respond to the congressional officials. According to Ickes, his office's standard procedure in dealing with a letter such as this one – from a United States Senator and six other Congressmen – would be for O'Connor to provide Ickes a draft personal response from Ickes to the officials.

f. White House Policy Regarding Contacts With Agencies

It is undisputed that there were contacts between the White House and the Department of the Interior in May and June 1995, when Interior's decision-making process on Hudson was ongoing. (*See* Section II.E.4.e., *supra*.) Staff at Interior and the White House have asserted that the contacts were nothing more than "routine status inquiries."³³³ The available direct evidence of those contacts is generally consistent with that description. By comparison, some circumstantial evidence suggests that the contacts may have been more than routine status inquiries, but does not prove that those communications had any specifically prohibited content or impact. To help assess issues of knowledge and intent relating to witnesses' accounts of how and why these contacts took place, we examined internal White House policies in effect at that time concerning contacts with administrative agencies or departments about pending administrative matters.

³³²O'Connor had no recollection of sharing Sibbison's drafts with Ickes.

³³³*See* Sections II.E.4.e.1. & 2, *supra*. *See also* Section II.K.1.a., *infra*.